

1 **DORIS NEHME-TOMALKA, ESQ.**
2 Nevada Bar No. 6431
3 **NEHME-TOMALKA AND ASSOCIATES**
4 2620 Regatta Drive, Suite 102
5 Las Vegas, Nevada 89128
6 Telephone: 702-240-5280
7 Facsimile: 702-240-5380
8 Email: doris@nehme-tomalka.com
9 *Attorney for Defendants CHRISTA DOWNES*
10 *fka CHRISTA SHEDD and*
11 *BRADLEY RANDALL*

8 **UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF NEVADA**

10 METROPOLITAN LIFE INSURANCE
11 COMPANY,

12 Plaintiff,

13 v.

14 DAVID M. DOWNES, DANIEL R.
15 DOWNES, COLLEEN P. DOWNES,
16 KAREN A. MACAULAY, BRADLEY
17 RANDALL, CHRISTA D. SHEDD,

Defendants.

Case No. 2:22-CV-00894-MMD-BNW

**STIPULATION TO EXTEND TIME
FOR DEFENDANTS CHRISTA D.
SHEDD and BRADLEY RANDALL TO
RESPOND TO DEFENDANTS DAVID
M. DOWNES, DANIEL R. DOWNES,
COLLEEN P. DOWNES, AND KAREN
A. MACAULAY'S MOTION FOR
JUDICIAL NOTICE OF STATE OF
NEVADA, DISTRICT COURT'S (1)
STIPULATED DECREE OF DIVORCE,
AND (2) ORDER FROM MARCH 26,
2019 HEARING, AND MOTION FOR
SUMMARY JUDGMENT; ORDER**

[SECOND REQUEST]

19
20 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
21 attorneys that Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall may have
22 additional time, up to and including June 2, 2023, within which to file their response/opposition to
23 Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay's
24 Motion for Judicial Notice of State of Nevada, District Court's (1) Stipulated Decree of Divorce, and
25 (2) Order from March 26, 2019 Hearing [Doc. 21] and Motion for Summary Judgment [Doc. 22].
26 Therefore, the last day for Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall
27 Defendant to file their response/opposition to the Motion for Judicial Notice [Doc. 21] and the Motion
28

1 for Summary Judgment [Doc. 22] will be June 2, 2023.

2 Good cause exists as there are pending motions and matters in the divorce case in the Eighth
3 Judicial District Court. That is the same divorce case in which the orders that are the subject of the
4 Motion of Judicial Notice and Motion for Summary Judgment are filed. Defendants Christa Downes
5 and Karen Macaulay need additional time to reach a stipulation, or to obtain an order from the Court,
6 regarding the parties' use of some of the sealed documents in the divorce case.

7
8 This document is being electronically filed through the Court's ECF System. In this regard,
9 counsel for Defendants Christa D. Shedd nka Christa Downes and Bradley Randall hereby attests that
10 (1) the content of this document is acceptable to all persons required to sign the document; (2) Counsel
11 for Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay
12 Plaintiff's counsel has concurred with the filing of this document; and (3) a record supporting this
13 concurrence is available for inspection or production if so ordered.

14
15 DATED this 26th day of April, 2023.

16 CLARK MCCOURT

17 /s/ Brian P. Clark
18 Brian P. Clark (Nevada Bar No. 4236)
19 Lukas B. McCourt (Nevada Bar No. 11839)
20 7371 Prairie Falcon Road, Suite 120
21 Las Vegas, NV 89128
22 *Attorneys for Defendants David R. Downes,
Daniel Downes, Colleen P. Downes, and
Karen A. Macaulay*

23 DATED this 26th day of April, 2023.

24 NEHME-TOMALKA AND ASSOCIATES

25 /s/ Doris Nehme-Tomalka
26 Doris Nehme-Tomalka (Nevada Bar No. 6431)
27 2620 Regatta Drive, Suite 102
28 Las Vegas, NV 89128
*Attorney for Defendant
Christa Downes aka Christa Shedd*

ORDER

Pursuant to the parties' stipulation, **IT IS SO ORDERED.**

Defendants Christa D. Shedd *nka* Christa Downes and Bradley Randall shall have up to and including June 2, 2023 to file their response/opposition to Defendants David M. Downes, Daniel R. Downes, Colleen P. Downes, and Karen A. Macaulay's Motion for Judicial Notice of State of Nevada, District Court's (1) Stipulated Decree of Divorce, and (2) Order from March 26, 2019 Hearing [Doc. 21] and the Motion for Summary Judgment [Doc. 22].

DATED: May 1, 2023

**MIRANDA M. DU,
CHIEF UNITED STATES DISTRICT JUDGE**